

Hearing Date: October 6, 2021, at 9:30 AM (Atlantic Standard Time)

Response Deadline: September 20, 2021, at 4:00 PM (Atlantic Standard Time)

PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO  
TO DETERMINE WHETHER THE OBJECTION AFFECTS YOUR CLAIM(S).

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the  
Commonwealth, COFINA,  
HTA, ERS, and PBA.

THREE HUNDRED SEVENTY-FOURTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO  
SALES TAX FINANCING AUTHORITY, PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, EMPLOYEES RETIREMENT SYSTEM OF THE  
GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO, AND PUERTO  
RICO PUBLIC BUILDINGS AUTHORITY TO LATE-FILED CLAIMS

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA", and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the "Debtors") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

To the Honorable United States District Court Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Sales Tax Financing Authority (“COFINA”), the Puerto Rico Highways and Transportation Authority (“HTA”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, COFINA, HTA, ERS, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> file this three hundred seventy-fourth omnibus objection (the “Three Hundred Seventy-Fourth Omnibus Objection”) to the proofs of claim listed on Exhibit A hereto, for failure to comply with the terms of the Bar Orders, as defined below, and in support of the Three Hundred Seventy-Fourth Omnibus Objection, respectfully represent as follows:

### JURISDICTION

1. The United States District Court for the District of Puerto Rico has subject matter jurisdiction to consider this matter and the relief requested herein pursuant to PROMESA section 306(a).
2. Venue is proper in this district pursuant to PROMESA section 307(a).

### BACKGROUND

#### **A. The Bar Date Orders**

3. On May 3, 2017, the Oversight Board issued a restructuring certification pursuant to PROMESA sections 104(j) and 206 and filed a voluntary petition for relief for the Commonwealth of Puerto Rico (the “Commonwealth”) pursuant to PROMESA section 304(a),

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

UNITED STATES DISTRICT COURT  
ROOM 150 FEDERAL BLDG  
SAN JUAN PR 00918-1767

①

SEPTEMBER 7-2021

In

THE FINANCIAL OVERSIGHT AND PROMESA  
MANAGEMENT BOARD FOR PUERTO RICO  
TITLE III

AS REPRESENTATIVE OF

NO. 17 BK 3283-LTS

THE COMMONWEALTH OF  
PUERTO RICO, ET AL  
DEBTORS

JOINTLY ADMINISTERED

OSBE E. JOHNSON  
PLAINTIFF - CREDITOR

THIS FILING RELATES TO  
THE COMMONWEALTH,  
COFINA,  
HTA, EKS, and PBA.

TITLE OR QUALIFICATION THIS FILING RELATES OR REFERS TO  
THE COMMONWEALTH COFINA HTA, EKS, and PBA,  
AS THEY CLAIM TO A LATE-FILED CLAIM OF THE  
OMNIBUS OBJECTION MY NAME WRONGLY APPEAR AND  
LISTED ON EXHIBIT A NUMBER 370, 371 and 372, they got  
it wrong. I REPLY OR FILE A RESPONSE TO THE OMNIBUS  
OBJECTION I SHOULD NOT BE REFERRED TO THE PUERTO  
RICO PROMESA TITLE III AUTOMATIC STAY SECTION  
362 OF THE BANKRUPTCY CODE, or bankruptcy 3007(d)(4)  
OMNIBUS OBJECTION.

TO THE HONORABLE COURT OR THE HONORABLE COMMONWEALTH  
OF COFINA, EKS, EKS, and PBA,

COMES NOW PLAINTIFF - CREDITORS OSBE E. JOHNSON  
AND BEFORE THIS HONORABLE COURT OR THE HONORABLE COMMONWEALTH  
COFINA, HTA, EKS, and PBA, TO THE RAT  
DATE OF OMNIBUS OBJECTION.



REASONS, FOR OPPOSING THE DRAINING OBJECTION  
BELOW

THE COMMONWEALTH OF PUERTO RICO (OFING, HTA  
ERS, and PRA BAL - Date On The Defenses THREE  
Hundred SEVENTY-FOURTH DRAINING OBJECTION  
TO include my name in Exhibit A TO Disallow  
my claim, and wrongly concluded that my claim  
has been FILED AFTER JUNE 29, 2018.

THE INCIDENCE OCCURRED OF MY WRONGFUL OR ILLEGALLY  
INCARCERATION BEGAN ON FEBRUARY 18 OF 2005  
(12 year) TWELVE YEARS AFTER, PROMESA LAW BEGINS,  
ON MAY 3, 2012 THE COMMONWEALTH OF PUERTO RICO  
FILED A PETITION FOR RELIEF UNDER TITLE III OF  
PROMESA 48 U.S.C. 2116 ET SEQ WITHIN THE DISTRICT  
COURT OF PUERTO RICO,

EXPLANATION THAT I AM EXEMPT OR EXCLUDED FROM  
LAW PROMESA SEE DOCKET ENTRY NO. 12772 IN CASE  
NO. 17-3283 THAT MOTION, PREVIOUSLY FILED, I REPEAT  
AND ATTACHMENT

I WAS ILLEGALLY ADMITTED INTO THE PUERTO RICO  
CORRECTION PRISON ON FEBRUARY 19, 2005, MY ILLEGALLY  
INCARCERATION BEGAN BEFORE THE PUERTO RICO OVERSIGHT  
MANAGEMENT AND ECONOMIC STABILITY ACT (PROMESA)  
LAW WAS ENACTED, THE AUTOMATIC STAY NOW IN EFFECT  
PURSUANT TO PROMESA SHOULD NOT APPLY TO THIS  
ACTION SEEKING COMPENSATION FROM THE COMMONW-  
EALTH OF PUERTO RICO, FOR THE TIME I WAS SPEND ILLEGALLY  
INCARCERATED AND FOR THE LOSS OF MY COMPANY,

SEE DOCKET ENTRY NO. 12772 IN CASE NO. 17-3283

ON SEPTEMBER 24, 2021, THIS ARGUMENT WAS TO BE  
EXEMPT - EXCLUDED FROM PROMESA LAW.

3

I am already EXEMPT-EXCLUDED FROM THE PROMESA LAW, and my name appears on the Omnibus Objection Exhibit A to the three hundred seventy-fourth that my claim to be DISMISSED, it is the same or similar Argument repeatedly

the Commonwealth of Puerto Rico, COFINA HTA, ERS, and PBA, I am EXEMPT-EXCLUDED FROM THE Bankruptcy stay provision of 11 U.S.C. 362 and 922 are incorporated into PROMESA TO include my name at the Omnibus Objection Exhibit A TO DISMISSED my claim

### Background

I do submit documentation that I am EXCLUDED OR EXEMPT FROM PROMESA LAW, these documents also to prove that the incidence occurred before PROMESA LAW came into exist

### Documentation Listed Below

- ① On February 19, 2005, I was illegally or wrongfully admitted into the Puerto Rico Collection Prison (document number one)
- ② On September 15, 2005, I was illegally or wrongfully sentenced by the Commonwealth trial court of San Juan Puerto Rico (document number two)
- ③ PROVE that on November 3 of 2004 I opened my own carpet cleaning company in Philadelphia because of misrepresentation from their attorney, Iubiana Acaron Portata-Oreia which caused me to lose my company, business license (number three 3)



including document of the same or similar argument that takes place within the United States Court of Appeals for the First Circuit, U.S. Bankruptcy Court of the District of Puerto Rico, including the Commonwealth of Puerto Rico, document (number four)

document of the Department of Justice of the Commonwealth of Puerto Rico Office of their investigation and processing criminal, the date and time they falsified accused me and wrongly or illegally admitted into the Puerto Rico correction prison

I am exempt-excluded from PROMESA law to include my name in exhibit A number 370, 371 and 371 to the three hundred seventy-fourth Omnibus Objection, that my claim to be disallowed

this falsified incidence occurred before PROMESA law came into exist in Puerto Rico,

Further my claim do not fall under any of the exceptions to the bankruptcy stay set forth in section 362 (5), to refer me to the PROMESA section 307(4) the three hundred-fourth Omnibus Objection

This is the second time this bankruptcy court hearing this same or similar matter on time-limitation,

Argument similar to section 405 PROMESA section 362 of the United States bankruptcy code provides that court may grant relief from the automatic stay to a party in interest for cause 11 USC 362(d)(1) as if like PROMESA HOWEVER SECTION 362 DOES NOT PROVIDE CONCRETE GUIDANCE ON HOW THAT OUGHT TO BE

(5)  
construed and applied in practice

WHEREFORE OR FINALLY I REQUEST THIS HONORABLE  
Bankruptcy Court OF THE COMMONWEALTH OF PUERTO  
RICO (DJ.NG, HTA, ERS, and PBA, according to  
the time I WAS illegally admitted into the  
PUERTO RICO Correctional Prison on FEBRUARY  
19, 2005, and AT THE SAME TIME LOSE my companion  
pursuant to PROMESA SECTION 307(9) OF THE  
THREE HUNDRED SEVENTY-FOURTH Omnibus  
OBJECTION IS NOT REFERRED TO ME,

DATED September 7-2021

RESPECTFULLY SUBMITTED

Address Doe E. J. J. J.

Guayama Correctional

Complex

AB-D35

Signature Doe E. J. J. J.

P.O. Box 1000-5

Guayama, PR 00785